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January 9, 2025

BY ECF

Hon. Katherine Polk Failla
United States Courthouse
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Nadine Wade, 21 Cr. 472 (KPF)

Dear Judge Failla:

The defense sentence submission and exhibits were filed under seal last evening. As we believe that some of the content is subject to sealing on several different grounds, it is respectfully requested the entire filing be temporarily taken under seal to give the parties time to agree as to the correctly sealed content. I have begun that process with the government, and it is hoped we will reach consensus shortly after which a redacted public filing will be proposed to the Court for filing on the case docket.

Given these circumstances, it is respectfully requested that your Honor grant the instant request for temporary filing of our submission at this time.

Thank you very much for your attention to this matter.

Respectfully submitted,

Robert A. Soloway

Robert A. Soloway

cc: AUSA Matthew King
RAS:sc

Application GRANTED. Defendant Wade's sentencing submission will be temporarily filed under seal, viewable to the Court and the parties only.

The Clerk of Court is directed to terminate the pending motion at docket entry 344.

Dated: January 10, 2025
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE